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Counsel for Defendant LUNA

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JAMES LUNA,

Defendant.

No. CR 23-00480-PCP

STIPULATION AND ~~PROPOSED~~ ORDER  
TO CONTINUE STATUS CONFERENCE

Defendant James Luna and the Government, by and through their respective counsel, stipulate and agree, with the Court's approval, that the status conference currently set for March 20, 2024 at 10:00 a.m. may be continued to May 8, 2024 at 10:00 a.m. The reason for the requested continuance is that the United States needs additional time to respond to the defense's supplemental discovery requests.

The parties also stipulate and agree that excluding time to May 8, 2024 will allow for effective preparation of counsel. 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding the time from March 20, 2024 to May 8, 2024 outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. §§ 3161(h)(7)(A), (h)(7)(B)(iv).

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STIPULATION AND ~~PROPOSED~~ ORDER  
CR 23-00480-PCP

1 IT IS SO STIPULATED.

2  
3 Dated: March 15, 2024

JODI LINKER

Federal Public Defender

4 \_\_\_\_\_/s/\_\_\_\_\_

5 Jessica Yu

6 Assistant Federal Public Defender

7 Dated: March 15, 2024

ISMAIL J. RAMSEY

United States Attorney

8 \_\_\_\_\_/s/\_\_\_\_\_

9 Neal C. Hong

10 Assistant United States Attorney

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12 ~~[PROPOSED]~~ **ORDER**


13 Upon agreement and stipulation of the defendant James Luna, and the United States, and  
14 their respective counsel, and good cause appearing, IT IS HEREBY ORDERED that defendant  
15 James Luna's status conference may be continued to May 8, 2024 at 10:00 a.m.

16 It is also ORDERED that time may be excluded from March 20, 2024 to May 8, 2024 to  
17 allow for the effective preparation of counsel. The Court finds that failing to exclude time to  
18 May 8, 2024 would unreasonably deny counsel the reasonable time necessary for effective  
19 preparation, taking into account the exercise of due diligence. *See* 18 U.S.C. §§ 3161(h)(7)(A),  
20 (h)(7)(B)(iv).

21 The Court further finds that the ends of justice served by excluding the time between  
22 March 20, 2024 and May 8, 2024 outweigh the interests of the public and the defendant in a  
23 speedy trial. 18 U.S.C. §§ 3161(h)(7)(A), (h)(7)(B)(iv).

24 IT IS SO ORDERED.

25 DATED: March 18, 2024

26   
HONORABLE P. CASEY PITTS  
United States District Judge